

WEIL, GOTSHAL & MANGES LLP  
Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Theodore E. Tsekerides (*pro hac vice*)  
(theodore.tsekerides@weil.com)  
Richard W. Slack (*pro hac vice*)  
(richard.slack@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (415) 636-9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' STATEMENT IN  
RESPONSE TO THE EMERGENCY PLEADING  
OF THERESA ANN MCDONALD REQUESTING  
RECONSIDERATION OF THE IDENTIFICATION  
OF PARTIES WHO TIMELY OBJECTED TO THE  
FIRE VICTIM CLAIMS RESOLUTION  
PROCEDURES**

**Relates to Docket Nos. 8053, 8137, 8199**

1 In accordance with the Court's *Order Directing the Debtors, the TCC and Fire Victims'*  
2 *Trustee to Respond to Motion* [Docket No. 8199], PG&E Corporation and Pacific Gas and Electric  
3 Company, as reorganized debtors (collectively, the "**Debtors**" or the "**Reorganized Debtors**," as  
4 applicable) in the above-captioned chapter 11 cases (the "**Chapter 11 Cases**"), hereby submit this  
5 Statement in response to Theresa Ann McDonald's *Emergency Pleading Requesting*  
6 *Reconsideration of the Identification of Parties Who Timely Objected to the Fire Victims Claims*  
7 *Resolution Procedure* [Docket No. 8137] (the "**Motion**").<sup>1</sup>

8 From the outset of these cases approximately seventeen months ago, the Debtors made clear  
9 that establishing a process to provide compensation to holders of allowed Fire Victim Claims in a  
10 fair and equitable manner was one of the Debtors' principal objectives. The Plan has been  
11 confirmed and became effective on July 1, 2020 in compliance with AB 1054, and the Debtors have  
12 funded the Fire Victim Trust as provided in the Plan.

13 The TCC, the Fire Victim Trustee, and their retained professionals, all of whom are  
14 fiduciaries for the beneficiaries of the Fire Victim Trust, have been charged with the development  
15 and formulation of the Fire Victim Claims Resolution Procedures. That task always has been within  
16 their purview, with the Debtors having no responsibility in connection therewith other than ensuring  
17 that those procedures are consistent with the Plan.

18 The Reorganized Debtors trust that the fiduciaries for the holders of Fire Victim Claims will  
19 maintain procedures that are fair and equitable to all beneficiaries of the Fire Victim Trust and defer  
20 to the Court to determine whether the relief requested in the Motion is consistent with that principle.

21  
22  
23  
24  
25  
26 <sup>1</sup> Capitalized terms used but not herein defined have the meanings ascribed to them in the Motion  
27 or the *Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated*  
28 *June 19, 2020* [Docket No. 8048] (as may be modified, amended, or supplemented from time to  
time, and together with any exhibits or scheduled thereto, the "**Plan**"), as applicable.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: July 8, 2020

**WEIL, GOTSHAL & MANGES LLP**  
**KELLER BENVENUTTI KIM LLP**

/s/ Stephen Karotkin  
Stephen Karotkin

*Attorneys for Debtors and Reorganized Debtors*